

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18-00009-01,02-CR-W-RK
)	
JONATHAN M. BRAVO-LOPEZ and)	
JUAN D. OSORIO,)	
)	
Defendant.)	

**MEMORANDUM OF MATTERS DISCUSSED AND
ACTION TAKEN AT PRETRIAL CONFERENCE**

PENDING CHARGE: On February 25, 2020, the Grand Jury returned a five-count Superseding Indictment charging Defendant Jonathan M. Bravo-Lopez and Juan D. Osorio with conspiracy to commit kidnapping (Count One), kidnapping resulting in death (Count Two), and using a firearm to commit murder (Count Three). Additionally, Defendant Bravo-Lopez was charged with unlawful re-entry (Count Five), and Defendant Osorio was charged with alien in possession of a firearm (Count Four).¹

The following matters were discussed and action taken during the pretrial conference:

TRIAL COUNSEL:

Government: Patrick C. Edwards and Matthew Aaron Moeder
Case Agent: Michael Harrison, FBI and Lauren Stout (paralegal)
Defense: Defendant Bravo-Lopez – Thomas H Johnson
Defendant Osorio – Lisa G. Nouri
Mark Reeder (investigator)

OUTSTANDING MOTIONS: Please note a suppression hearing was held on Doc. #118 on 9/27/2022.

02/01/2022	view118	MOTION to suppress by Jonathan M Bravo-Lopez. Suggestions in opposition/response due by 2/15/2022 unless otherwise
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¹ Co-Defendant Marco A. Sosa-Perea pled guilty to Count One of the Superseding Indictment and is awaiting sentencing.

		directed by the court. (Attachments: # 1 Exhibit A - Miranda Waiver)(Johnson, Thomas) (Entered: 02/01/2022)
10/27/2022	view159	MOTION to Dismiss Count(s) Three by Jonathan M Bravo-Lopez. Suggestions in opposition/response due by 11/10/2022 unless otherwise directed by the court. (Johnson, Thomas) (Entered: 10/27/2022)
11/10/2022	view170	MOTION to Dismiss on the Superseding Indictment Count(s) 3 by USA as to Jonathan M Bravo-Lopez, Juan D Osorio. Suggestions in opposition/response due by 11/25/2022 unless otherwise directed by the court. (Edwards, Patrick) (Entered: 11/10/2022)

TRIAL WITNESSES:

Government: 30 with stipulations; 41 without stipulations

Defendants:

Defendant Bravo-Lopez – 8 witnesses, including the Defendant

Defendant Osorio – 3 witnesses, including the Defendant

TRIAL EXHIBITS:

Government: approximately 161 exhibits (the Government asks to reserve 1 through 500 for numbering purposes)

Defendants:

Defendant Bravo-Lopez – approximately 1 additional exhibit

Defendant Osorio – no additional exhibits beyond the Government's list

DEFENSES: General denial

POSSIBLE DISPOSITION:

(X) Definitely for trial; () Possibly for trial; () Likely a plea will be worked out

TRIAL TIME: 10 days total

Government's case including jury selection: 8 day(s) without stipulations

Defendants: 2 day(s)

STIPULATIONS: The parties are still working on stipulations.

UNUSUAL QUESTIONS OF LAW: There are questions regarding the Government's expert disclosure and whether it was timely. The Government has endorsed an expert witness who is scheduled to do an evaluation of Defendant Bravo-Lopez on November 30, 2022.

FILING DEADLINES:

Witness and Exhibit List

Government: Proposed Witness List and Exhibit List filed on 11/07/2022. **Updated list(s) due on or before November 22, 2022.**

Defendants: Proposed Witness Lists and Exhibit Lists filed on 11/05/2022 and 11/07/2022. **Updated list(s) due on or before November 22, 2022.**

Counsel are requested to list witnesses in alphabetical order on their witness list.

Exhibit Index, if required by the District Court, Voir Dire, Jury Instructions: Due on or before November 30, 2022.

Please Note: Jury instructions must comply with Local Rule 51.1

Motion in Limine: One or more parties have filed or anticipate filing motions in limine.
Due on or before November 30, 2022.

TRIAL SETTING: Criminal jury trial docket set for December 5, 2022.

Please note: The parties prefer the first week due to the length of trial and witness availability, however there is no conflict with the second week.

IT IS SO ORDERED

/s/ Lajuana M. Counts

LAJUANA M. COUNTS

UNITED STATES MAGISTRATE JUDGE